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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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December 21, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Comments and Counterproposal
in FM Allocation Rulemaking
Proceeding in Cross Plains,
Texas; MM Docket No. 98-198

Dear Ms. Salas:

Transmitted herewith is an original and four copies of
"Comments And Counterproposal" of Gulfwest Broadcasting
Company and Sonoma Media Corporation, jointly filing as
"Counter-Petitioners" in this proceeding.

Please note that undersigned counsel for Sonoma Media
Corporation will also accept service in this proceeding for
Gulfwest Broadcasting Company.

Should any additional information be required, please
contact this office.

Very truly yours,


Robert J. Buenzle
Counsel for Sonoma
Media Corporation

cc: Service as shown on attached Certificate of Service

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) MM Docket No. 98-198
)
Amendment of Section 73.202(b)) RM-
Table of Allotments)
FM Broadcast Stations)
(Cross Plains, Texas))

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS AND COUNTERPROPOSAL

Gulfwest Broadcasting Company, licensee of radio station KVCQ(FM) Cuero, Texas, along with Sonoma Media Corporation, proposed Assignee of KVCQ(FM) 1/ (hereinafter referred to jointly as "Counter-Petitioners") and pursuant to Sections 1.415 and 1.420 of the Commission's Rules hereby files the instant Comments and Counterproposal in response to the Notice of Proposed Rulemaking ("NPR") issued in the above-captioned proceeding as released October 30, 1998 (DA 98-2188).

In the NPR Alalatex Broadcasters ("Alalatex")) proposed the allotment of Channel 245C3 at Cross Plains, Texas, and indicated it would file an application for that channel if so allotted.

Conversely, Petitioner in the instant counterproposal submits a plan that will in fact improve the original request for Cross Plains (by substituting Channel 272C1 in place of the originally requested Channel 245C3) and also upgrade Channel

1/ The parties have recently executed a contract for sale of the station and anticipate filing application form 314 requesting FCC approval of the sale within the next 15 days.

249C3 currently occupied by KVCQ as a directionalized short-spaced service in Cuero, to fully-spaced channel 249C2 relocated north to provide a second service by KVCQ to the new city of license of Luling, Texas. The channel removed from Cuero would be replaced by allotment of new channel 280A to Cuero, along with noncommercial channel 210A which is already allotted there and with two applications pending, assuring continued service there.

Reference to the attached Engineering Exhibit in support of this counterproposal specifies and documents in full detail how each of the requested changes are accomplished and their compliance, and furtherance, of the Commission's rules and policies that govern such changes. As set forth therein, adoption of this counterproposal would therefore result in an upgrade of service from C3 to C1 in the original proposal for Cross Plains, upgrade existing channel 249C3 in Cuero to channel 249C2 in Luling, and add a new allotment of channel 280A in Cuero. In order to achieve this result, it will be necessary to substitute equivalent channels for two existing stations in Brownwood, Texas, those being channel 245C2 for channel 257C2 currently occupied by KPSM, and channel 257C1 for channel 281C1 currently occupied by KXYL, both at their existing sites. It will also be necessary to change, with their consent, channel 246A to 291A presently occupied by KBAL in San Saba, Texas, also at its existing site. A copy of the consent letter for the KBAL change is attached hereto.

The only other required change would be to the unoccupied existing allocation of channel 249C2 in Mason, Texas, which would be changed to 281C2. There are three existing applications pending for use of the channel in Mason and the attached engineering study establishes that all three could use the new channel allocation at their existing application sites.

KVCQ currently provides service to the city of Cuero on channel 249C3. It is however precluded by engineering considerations from increasing its class and service to surrounding communities from that location. Relocation to Luling would however allow the channel and service to be upgraded from its present short-spaced, directionalized C3 service, to a fully spaced, non-directional C2 service. The relocation from Cuero to Luling would be approximately 27 miles North between transmitter sites, resulting in a substantial area north of Cuero still receiving a strong reception service from KVCQ in Luling.

As noted in the attached Engineering Exhibit, reallocation of KVCQ to Luling would provide a second local service to Luling (KAMX on channel 234C is already licensed to Luling) and the population included within the 60 dbu service area of KVCQ in Luling on channel 249C2 would be 82,738 persons. Both Cuero and Luling already receive substantial reception service from existing stations. While providing this additional wide area service with the upgraded channel in Luling, it is also noted that neither Luling nor its County (Caldwell) are located in any part of any Urbanized Area.

Since the existing operation of KVCQ in Cuero is already short-spaced by 10.88 Km to the adjacent channel operation of KYTX(FM) on channel 250C2 in Beeville, Texas, any further upgrade of KVCQ in Cuero would not be possible. Conversely, removal of KVCQ on channel 249C3 to its new location in Luling would not only allow an upgrade in service on that channel but would have the further substantial benefit of removing an existing directional operation and short-space problem.

In proposing the removal of KVCQ on channel 249C3 from Cuero to its new location on channel 249C2 in Luling, Counter-Petitioners have also provided for a replacement channel, as a companion to the existing channel 210A already allotted and applied for there, providing for a continued availability of service of two stations to Cuero, and has therefore included in its counterproposal the new allocation of channel 280A to Cuero. As shown in the attached Engineering Report, that channel can provide full service coverage to all of Cuero and Counter-Petitioners hereby indicate their intention and commitment to promptly apply for use of that channel there if allocated.

It is also noted that under the Commission's rules, the proposed reallocation of Channel 249C3 from Cuero to a new location on channel 249C2 in Luling would be a co-channel improvement by the licensee KVCQ moving its city of license from Cuero to Luling and would be a protected move, not subject to outside expressions of interest. Counter-Petitioners commit to build and operate KVCQ on Channel 249C2 as requested herein and

it is therefore requested that any adoption of this counterproposal include an Order directing the licensee of KVCQ to proceed with such application and construction.

As previously noted, under this counterproposal, the original proposal as requested by Alalatex for Cross Plains would be upgraded from the C3 channel originally requested and included in the Notice of Proposed Rulemaking to a C1 as proposed here. Counter-Petitioners also hereby state their firm interest and commitment to promptly file an application for construction and operation of channel 272C1 in Cross Plains if allocated as requested herein.

Counter-Petitioners also agree here to reimburse all necessary and prudent out-of-pocket expenses to any party in this proceeding required to change their channel allocation consistent with this proposal.

It is therefore respectfully submitted that this counterproposal would best serve the public interest in providing a maximum amount of new and expanded FM radio service in the communities and areas discussed herein, would provide further public interest benefits in removing an existing directional short-space in Cuero, resulting in the most efficient use of the available allocations to provide the greatest amount of service. Accordingly, consistent with the priorities as set forth by the Commission in Revision of FM Assignment Policies and Procedures, 51 P&F RR 807, 810 (1982), and as further set forth in Columbus, Nebraska, et.al., 51 Fed. Reg. 4926, Feb. 10, 1986. For these

reasons, it is respectfully submitted that the instant counterproposal is in the public interest and should be adopted and the Commission's Table of Allocations amended as follows:

City	Present	Proposed
Cross Plains, Texas	245C3	272C1
Brownwood, Texas	207A, 212A, 219A	207A, 212A, 219A
	257C2, 267C1, 281C1	257C1, 267C1, 245C2
Mason, Texas	249C2	281C2
Cuero, Texas	210A, 249C3	210A, 280A
Luling, Texas	234C	234C, 249C2
San Saba, Texas	210A, 246A	210A, 291A

Wherefore, it is respectfully submitted that the instant counterproposal is in the public interest and should be adopted.

Verified in accordance with Section 1.52 of FCC Rules under penalty of perjury that the above statements are true and correct to the best of our knowledge and belief as witness our respective signatures below:

Respectfully Submitted,

GULFWEST BROADCASTING COMPANY

by Rob Dean

Rob Dean, President
300 Pebblebeach
Portland, Texas 78374

SONOMA MEDIA CORPORATION

by Roy E. Henderson

Roy E. Henderson, President
P.O. Box 948
Houston, Texas 77001

December 21, 1998

FROM EQUUS

(MON) 12. 21 '98 09:15/ST. 09:14/NO. 3560249206 P 4

DEC 22 '98 04:48

P. 02

December 21, 1998

The Federal Communications Commission
1919 M Street, N.W.
Washington, D.C.

RE: TV Rulemaking Docket No. 98-198

This is to confirm that Equicom, Inc., licensee of Radio Station KBAL(FM), San Saba, Texas, is aware of the above-captioned Docket, of the Comments and Counterproposal filed by Gulfwest Broadcasting Company and Sonoma Media Corporation in that proceeding on December 31, 1998, and of the effect that adoption of the those Comments and Counterproposal would have upon the existing authorized facilities of KBAL.

was
291A
This is to further confirm that after a full review and consideration of the Comments and Counterproposal of Gulfwest Broadcasting Company and Sonoma Media Corporation, including the proposal to change our operating channel allocation from Channel 24.5A to 20.5A, that the licensee fully supports and accepts those changes and specifically supports and accepts the change that relates to station KBAL as being fully acceptable to us.

It is further understood that this statement may be included in a further Comment being prepared for filing by Gulfwest Broadcasting Company and Sonoma Broadcasting Corporation with the Federal Communications Commission in this docket and this is to further confirm their authorization to do so.

Respectfully submitted,

Equicom, Inc.

by W. B. Smith, Jr. BO

TECHNICAL COMMENTS
COUNTER-PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

Introduction

These Technical Comments support the Counter-Proposal by Gulf West Broadcasting, Inc., licensee of KVCQ, Channel 249C3 at Cuero, Texas and Sonoma Media Corp, proposed assignee of KVCQ (hereafter referred to as "Counter-Petitioners"). MM Docket No. 98-198 proposes to add Channel 245C3 at Cross Plains, Texas. The enclosed counter-proposal will actually upgrade the proposal at Cross Plains from Channel 245C3 to Channel 272C1. This proposal will also add Channel 249C2 as the second local service to Luling, Texas. Gulf West requests that KVCQ be ordered to move from Cuero to Luling. The present facilities of KVCQ at Cuero are short spaced to KYTX, Channel 250C2 at Beeville, Texas by 10.88 km. KVCQ operates under the provisions of §73.215. The proposed facility at Luling Texas will not require such a shortspacing. Channel 210A has been assigned to Cuero with two current pending applications for this channel.

Channel 272C1 -- NEW ALLOCATION - Cross Plains, Texas

It is proposed to substitute Channel 272C1 for the proposed Channel 245C3 at Cross Plains, Texas. It is clear that this is an upgrade (C1 for C3) from the original proposal. *Exhibit #1* shows the tabulated allocation study where Channel 272C1 can be assigned to Cross Plains, meeting all of the spacing requirements of Section 73.207 of the Commission's Rules and providing the proposed community of license with a 70 dBu or greater signal. Channel 272C1 reference coordinates are the same as proposed in Docket 98-198.

Channel 245C2 - KPSM – Brownwood, Texas

Channel 245C2 will be substituted for Channel 257C2 at Brownwood, Texas. KPSM will be ordered to Channel 245C2. KPSM can operate on Channel 245C2 at their present site. Channel 245C2 cannot be assigned to Brownwood with Channel 245C3 being assigned to Cross Plains, Texas; thus the reason for this counter-proposal. In order to add Channel 245C2 to Brownwood (*see Exhibit #2*) Channel 291A or 289A can be substituted for Channel 246A at San Saba, Texas (*See Channel 289A San Saba and Exhibit #7*). KVMX at Eastland, Texas has been ordered to Channel 236A per Docket 96-10 as was foot-noted in the Notice of Proposed Rulemaking (Docket 98-198).

Channel 257C1 – KXYL – Brownwood, Texas

Channel 257C1 will be substituted for Channel 281C1 at Brownwood. KXYL will be ordered to Channel 257C1. Channel 257C1 can be utilized by KXYL at their present site (*see Exhibit #3*).

Channel 281C2 – ALLOCATION - Mason, Texas

Channel 281C2 will be substituted for Channel 249C2 at the allocation site at Mason, Texas. All applicants at Mason can use Channel 282C2. We show in *Exhibit #4* a Tabulated Allocation study for Channel 281C2. *Exhibits #4A-4C* shows the Mason, Texas applicant sites and how Channel 281C2 can be utilized at these application sites.

Channel 280A – ALLOCATION – Cuero, Texas

Channel 280A can be substituted for Channel 249C3 at Cuero, Texas. We show in *Exhibit #5* where Channel 280A can be assigned to Cuero. *Exhibit #5A* shows where a 70 dBu contour will cover the proposed community of license. The population within the Channel 280A 60 dBu contour is 20,291 persons according to the 1990 US Census.

We used the following site coordinates for a Channel 280A reference point: North Latitude 29° 13' 36", West Longitude 97° 14' 45".

Channel 249C2 – NEW ALLOCATION – Luling, Texas

Channel 249C2 can be assigned as the second local service to Luling, Texas and KVCQ can be ordered to move to Luling. We show in *Exhibit #6* that Channel 249C2 can be assigned to Luling. KVCQ can operate from that site and provide a 70 dBu city grade signal over the entire community of license (See *Exhibit #6A*). Luling is an incorporated community with a population of 4,661 persons in Caldwell County, Texas. Neither Luling nor Caldwell County is a part of any Urbanized Area. The population within the proposed 60 dBu contour at Luling is 82,738 persons. The Commission has determined the qualifications of Luling as a community deserving service by the assignment of Channel 234C (KAMX). The reference site was selected to provide maximum population coverage. We used the following reference coordinates for Channel 249C2: North Latitude 29° 31' 59", West Longitude 97° 38' 42".

Channel 291A – KBAL – San Saba, Texas

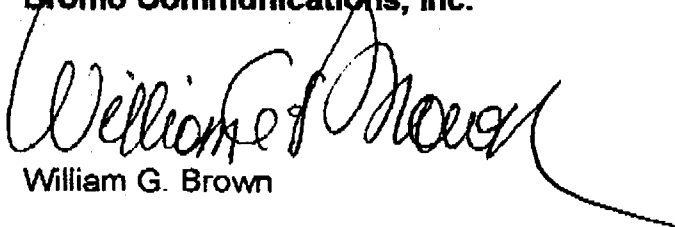
Equicom, Inc. licensee of KBAL at San Saba, Texas has agreed to allow the substitution of Channel 291A for Channel 246A. This channel may be used by KBAL on the present site. However Channel 291A has been proposed to be added to Mason, Texas under Rulemaking 97-244. The proposal to use Channel 291A at San Saba would create a shortspace under §73.207 with 291A at Mason. We understand that a counter proposal was made in this Docket to assign Channel 259A at Mason thus clearing channel 291A at San Saba. No matter which channel were used in Docket 97-244 we have found that Channel 289A can be substituted and used by KBAL at their present site (See *Exhibit #7*).

PROPOSED TABLE OF ALLOTMENTS

<u>Community/Station</u>	<u>Present</u>	<u>Proposed</u>	<u>Allocation Study</u>
Cross Plains, TX	245C3	272C1	Exhibit #1
Brownwood, TX	207A, 212A, 219A 257C2, 267C1, 281C1	207A, 212A, 219A 245C2, 257C1, 267C1	Exhibit #2 & 3
Mason, TX	249C2	281C2	Exhibit #4
Cuero, TX ¹	210A, 249C3	210A, 280A	Exhibit #5
Luling/KVCQ ²	234C	234C, 249C2	Exhibit #6
San Saba/KBAL	210A, 246A	210A, (291A or 289A)	Exhibit #7

If this proposal is adopted, the Counter-Petitioners agree and commit to be responsible to pay the reasonable expenses where necessary of each of the stations required to change channels. Once this proposal has been adopted the Counter-Petitioners agree to file a timely application to change the KVCQ facilities as ordered. Additionally the Counter-Petitioners will file a timely application for the proposed Channel 272C1 at Cross Plains, Texas.

Bromo Communications, Inc.


William G. Brown

¹ Reference Site for Cuero, TX is N. Lat. 29° 13' 36" – W. Lng. 97° 14' 45"

² Reference Site for Luling, TX is N. Lat. 29° 31' 59" – W. Lng. 97° 38' 42" Special reference site selected to maximize the population coverage from the proposed facility.

Allocation Study to Assign Channel 272C1
Counter Proposal Doc No. 98-198 RM-9304

REFERENCE	CLASS C1	DISPLAY DATES
32 07 42 N		DATA 12-11-98
99 11 18 W	Current rules spacings	SEARCH 12-14-98
----- CHANNEL 272 -102.3 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KTXQ	271C	Fort Worth-Dallas	TX	76.4	214.27	209.0	5.27
AD273	273C2	Mason	TX	185.1	165.76	158.0	7.76
KHXS	274C1	Merkel	TX	290.1	92.14	82.0	10.14
KBRQ	273C1	Hillsboro	TX	100.0	194.73	177.0	17.73

Allocation Study for Ch. 272C1, Cross Plains, TX

EXHIBIT #1
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO BROADCAST
TECHNICAL CONSULTANTS
COMMUNICATIONS

Allocation Study to Assign Channel 245C2
Order KPSM from 257C2 to 245C2, Brownwood, TX

REFERENCE		DISPLAY DATES
31 43 10 N	CLASS C2	DATA 12-11-98
99 00 57 W	Current rules spacings	SEARCH 12-15-98
----- CHANNEL 245 - 96.9 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD245	245C3	Cross Plains	TX	340.2	48.18	177.0	-128.82 *
* KBALFM	246A	San Saba	TX	154.0	65.23	106.0	-40.77 *
# KVMX	244A	Eastland	TX	11.3	85.55	106.0	-20.45 *
KEGL.C	246C	Fort Worth	TX	63.5	215.89	188.0	27.89

* It is proposed to substitute Channel 291A for Channel 246A at San Saba, TX. (See Exhibit #7)

Channel 236A was substituted for Channel 244A per Docket 96-10.

Allocation Study for Ch. 245C2, Brownwood, TX

EXHIBIT #2
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

Allocation Study to Assign Channel 257C1
Order KXYL from 281C1 to 257C1 Brownwood, TX

REFERENCE		CLASS C1	DISPLAY DATES
31 42 16 N			DATA 12-11-98
99 00 05 W		Current rules spacings	SEARCH 12-14-98
----- CHANNEL 257 - 99.3 MHz -----			

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KPSM	257C2	Brownwood	TX	320.5	2.15	224.0	-221.85 *
KELI	254C	San Angelo	TX	249.3	106.09	105.0	1.09 <
KPLX	258C	Fort Worth	TX	63.0	214.46	209.0	5.46
AP257	257A	Thorndale	TX	128.3	217.49	200.0	17.49

Allocation Study for Ch. 257C1, Brownwood, TX

EXHIBIT #3
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

Allocation Study to Assign Channel 281C2
To Mason, Texas - Reference Point is Allocation Site

REFERENCE		DISPLAY DATES
30 31 00 N	CLASS C2	DATA 12-11-98
99 07 00 W	Current rules spacings	SEARCH 12-14-98
CHANNEL 281 -104.1 MHz		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KXYLFM	281C1	Brownwood	TX	4.8	132.14	224.0	-91.86 *
KBAE	284C3	Llano	TX	70.2	55.64	56.0	-0.36 *
DE284	284C3	Llano	TX	70.2	55.64	56.0	-0.36 *
AL280	280C	Ciudad Acuna	CI	233.0	219.35	215.0	4.35

Allocation Study for Ch. 281C2, Mason, TX

EXHIBIT #4
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

Allocation Study to Assign Channel 281C2
Application Site by Fritz, Jayson D., and Fritz J.

REFERENCE		DISPLAY DATES
30 31 40 N	CLASS C2	DATA 12-11-98
99 07 51 W	Current rules spacings	SEARCH 12-14-98
----- CHANNEL 281 -104.1 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KXYLFM	281C1	Brownwood	TX	5.4	131.04	224.0	-92.96 *
KBAE	284C3	Llano	TX	71.8	56.52	56.0	0.52 <
DE284	284C3	Llano	TX	71.8	56.52	56.0	0.52 <
AL280	280C	Ciudad Acuna	CI	232.5	219.00	215.0	4.00

Allocation Study for Ch. 281C2, Mason, TX

EXHIBIT #4A
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

Application Study to Assign Channel 281C2
Application Site by BK Radio

REFERENCE	CLASS C2	DISPLAY DATES
30 33 58 N		DATA 12-11-98
99 06 48 W	Current rules spacings	SEARCH 12-14-98
----- CHANNEL 281 -104.1 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KXYLFM	281C1	Brownwood	TX	4.8	126.66	224.0	-97.34 *
* DE284	284C3	Llano	TX	75.6	53.70	56.0	-2.30 *
* KBAE	284C3	Llano	TX	75.6	53.70	56.0	-2.30 *
AL280	280C	Ciudad Acuna	CI	231.9	222.91	215.0	7.91
KBLT	282A	Leakey	TX	215.0	118.11	106.0	12.11
ALOPEN	281A	Pearsall	TX	179.5	185.61	166.0	19.61
AP281	281A	Pearsall	TX	178.8	186.26	166.0	20.26
KEYIFM	278C	San Marcos	TX	116.0	131.90	105.0	26.90
KQBT	282C2	Taylor	TX	95.0	168.50	130.0	38.50
KWTR.C	281C1	Big Lake	TX	296.4	267.81	224.0	43.81
AD283	283A	Eden	TX	316.0	100.50	55.0	45.50
KOOK	228A	Junction	TX	261.1	62.18	15.0	47.18

* Channel 285C3 was substituted for Channel 284C3 per Docket 95-49.

Allocation Study for Ch. 281C2, Mason, TX

EXHIBIT #4B
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

Application Study to Assign Channel 281C2
Application Site by Foxcom, Inc.

REFERENCE	CLASS C2	DISPLAY DATES
30 33 57 N		DATA 12-11-98
99 06 49 W	Current rules spacings	SEARCH 12-14-98
----- CHANNEL 281 -104.1 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KXYLFM	281C1	Brownwood	TX	4.8	126.69	224.0	-97.31 *
* DE284	284C3	Llano	TX	75.6	53.74	56.0	-2.26 *
* KBAE	284C3	Llano	TX	75.6	53.74	56.0	-2.26 *
AL280	280C	Ciudad Acuna	CI	231.9	222.87	215.0	7.87
KBLT	282A	Leakey	TX	215.0	118.07	106.0	12.07
ALOPEN	281A	Pearsall	TX	179.5	185.58	166.0	19.58
AP281	281A	Pearsall	TX	178.8	186.23	166.0	20.23
KEYIFM	278C	San Marcos	TX	116.0	131.92	105.0	26.92
KQBT	282C2	Taylor	TX	95.0	168.53	130.0	38.53
KWTR.C	281C1	Big Lake	TX	296.4	267.80	224.0	43.80
AD283	283A	Eden	TX	316.0	100.50	55.0	45.50
KOOK	228A	Junction	TX	261.1	62.15	15.0	47.15

* Channel 285C3 was substituted for Channel 284C3 per Docket 95-49.

Allocation Study for Ch. 281C2, Mason, TX

EXHIBIT #4C
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

Allocation Study to Assign Channel 280A
At Cuero, Texas

REFERENCE		DISPLAY DATES
29 13 50 N	CLASS A	DATA 12-11-98
97 17 17 W	Current rules spacings	SEARCH 12-14-98
----- CHANNEL 280 -103.9 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
-----	-----	-----	-----	-----	-----	-----	-----
KOUL	279C1	Sinton	TX	186.2	133.32	133.0	0.32 <
KHLR	280C2	Cameron	TX	14.6	172.59	166.0	6.59
KRBEFM	281C	Houston	TX	77.5	176.78	165.0	11.78
KRBEFM	281C	Houston	TX	77.5	176.78	165.0	11.78
KEYIFM	278C	San Marcos	TX	327.6	106.96	95.0	11.96
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Allocation Study for Ch. 280A, Cuero, TX

EXHIBIT #5
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

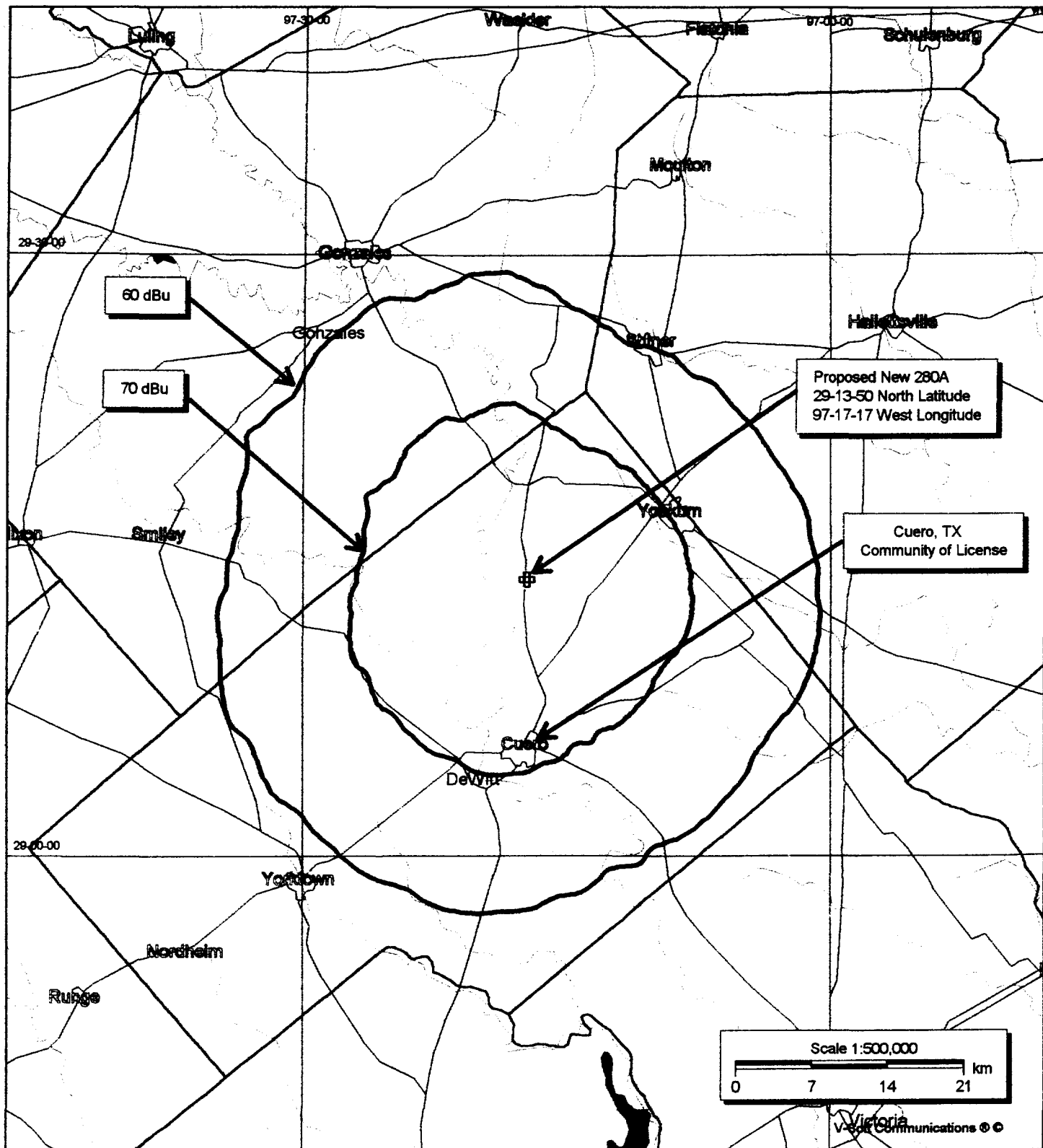


EXHIBIT #5A
Proposed 70 dBu Allocation Contour
Cuero, Texas

Bromo Communications, Inc.
 December 1998

Allocation Study to Assign Channel 249C2
At Luling, Texas

REFERENCE	CLASS C2	DISPLAY DATES
29 31 59 N		DATA 12-11-98
97 38 42 W	Current rules spacings	SEARCH 12-14-98
----- CHANNEL 249 - 97.7 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KVCQ	249C3	Cuero	TX	142.2	64.42	177.0	-112.58 *
* ALOPEN	249C2	Mason	TX	307.5	179.00	190.0	-11.00 *
* AP249	249C2	Mason	TX	307.6	180.83	190.0	-9.17 *
* AP249	249C2	Mason	TX	309.0	182.11	190.0	-7.89 *
* AP249	249C2	Mason	TX	308.9	182.12	190.0	-7.88 *
KVETFM	251C1	Austin	TX	347.0	78.52	79.0	-0.48 *
KAJA	247C	San Antonio	TX	269.4	104.57	105.0	-0.43 *
KYTX	250C2	Beeville	TX	194.4	132.42	130.0	2.42 <
KWTXFM	248C	Waco	TX	9.1	200.81	188.0	12.81
KWTXFM	248C	Waco	TX	9.1	202.60	188.0	14.60
KWTXFM	248C	Waco	TX	9.1	202.60	188.0	14.60
KBXX	250C	Houston	TX	88.7	206.97	188.0	18.97
KBXX	250C	Houston	TX	88.7	206.97	188.0	18.97
ALOPEN	249A	Cotulla	TX	233.3	190.48	166.0	24.48
KFTX	248C1	Kingsville	TX	178.8	198.64	158.0	40.64
DE252	252A	Pleasanton	TX	235.5	104.36	55.0	49.36
KBUC	252A	Pleasanton	TX	235.5	104.36	55.0	49.36
DE252	252A	Pleasanton	TX	235.5	104.36	55.0	49.36

* It is proposed to substitute Channel 281C2 for Channel 249C2 at Mason, Texas.

Allocation Study for Ch. 249C2, Luling, TX

EXHIBIT #6
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

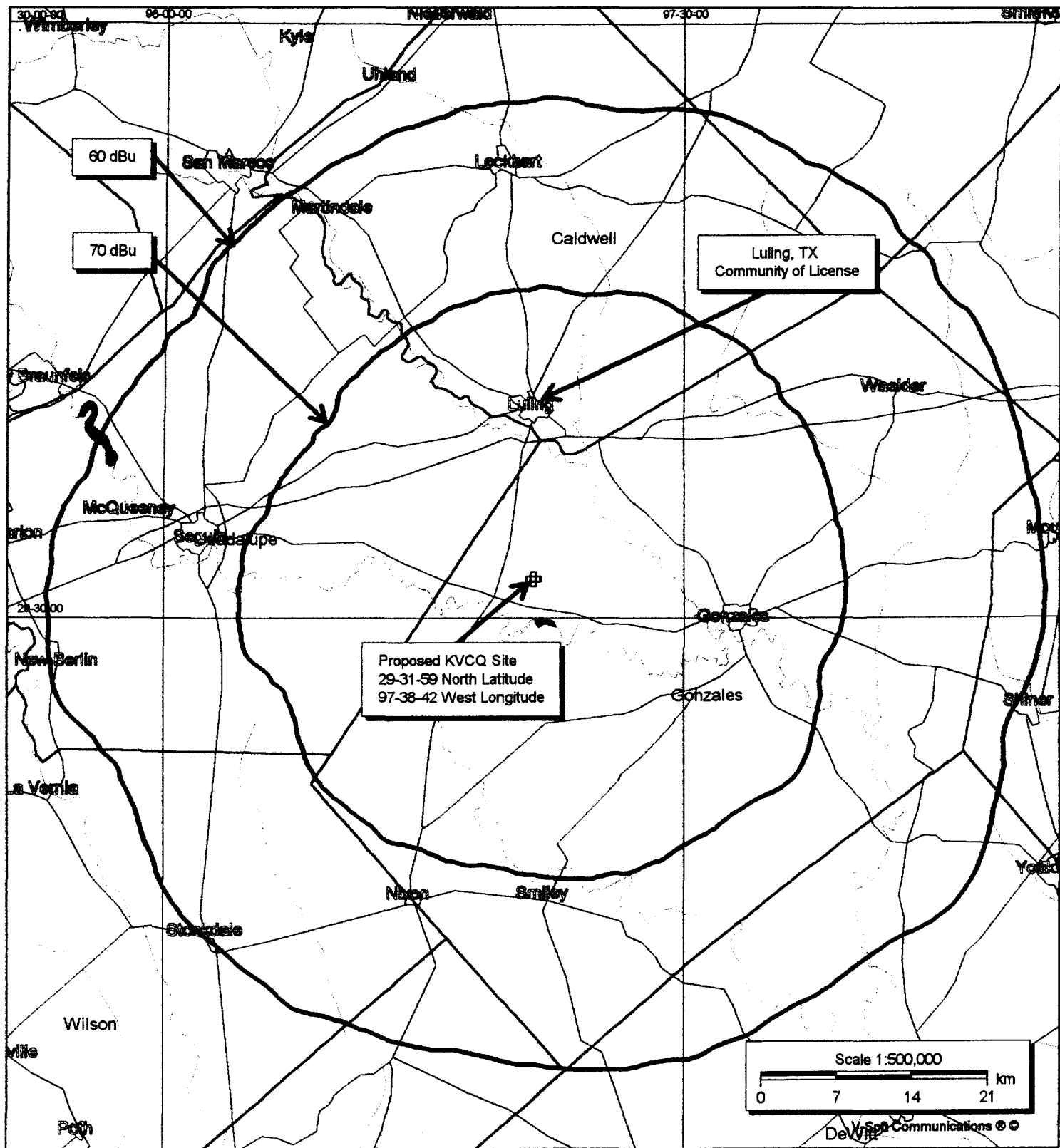


EXHIBIT #6A **Proposed 70 dBu Allocation Contour** **Luling, Texas**

Bromo Communications, Inc.
 December 1998

Allocation Study to Assign Channel 289A
Order KBAL from 246A to 289A, San Saba, TX

REFERENCE	CLASS A	DISPLAY DATES
31 11 26 N		DATA 12-11-98
98 42 55 W	Current rules spacings	SEARCH 12-15-98
----- CHANNEL 289 -105.7 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
* KBALFM	289A	San Saba	TX	0.0	0.00	115.0	-115.00 *
KYUL.C	288C2	Harker Heights	TX	102.4	105.94	106.0	-0.06 *
KYUL	288C2	Harker Heights	TX	96.0	107.08	106.0	1.08 <
KFMK.C	290C2	Round Rock	TX	137.6	130.15	106.0	24.15

* It is proposed to substitute Channel 246A for Channel 289A at San Saba, TX.

Allocation Study for Ch. 289A, San Saba, TX

EXHIBIT #7
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

Allocation Study to Assign Channel 291A
Order KBAL from 246A to 291A, San Saba, TX

REFERENCE	CLASS A	DISPLAY DATES
31 11 26 N	Current rules spacings	DATA 12-19-98
98 42 55 W	CHANNEL 291 -106.1 MHz	SEARCH 12-21-98

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
* AD291	291A	Mason	TX	225.1	69.44	115.0	-45.56 *
KHKS	291C	Denton	TX	46.7	226.41	226.0	0.41 <
KHKS	291C	Denton	TX	46.8	226.58	226.0	0.58 <
AD293	293A	Llano	TX	175.7	48.98	31.0	17.98
AD291	291A	Kerrville	TX	197.8	133.19	115.0	18.19

* Channel 259A has been counter proposed in Docket 97-244 at Mason, TX.

Allocation Study for Ch. 291A, San Saba, TX

EXHIBIT #7A
COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
December 1998

BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS

CERTIFICATE OF SERVICE

I, Robert J. Buenzle, do hereby certify that copies of the foregoing Comments and Counterproposal have been served by United States mail, postage prepaid this 21st day of December, 1998, upon the following:

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Mass Media Bureau
Federal Communications Commission
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Radio Station KBAL (FM)
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Watts Communications, Inc
Radio Station KXYL
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Brownwood, Texas 76801

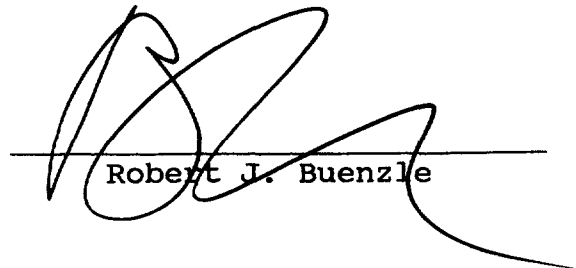
Living World Church of Brownwood, Inc.
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